

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

THE DEPARTMENT OF THE TREASURY OF
THE STATE OF NEW JERSEY AND ITS
DIVISION OF INVESTMENT, on behalf of
itself and all others similarly situated,

Plaintiff,

vs.

CLIFFS NATURAL RESOURCES INC.,
JOSEPH CARRABBA, LAURIE BRLAS,
TERRY PARADIE, and DAVID B. BLAKE,

Defendants.

Civ. A. No. 14-CV-1031-DAP

Hon. Dan Aaron Polster

**LEAD PLAINTIFF’S UNOPPOSED MOTION FOR LEAVE TO FILE
MEMORANDUM IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT IN EXCESS OF PAGE LIMITATIONS**

Pursuant to Local Civil Rule 7.1 of the United States District Court for the Northern District of Ohio, Lead Plaintiff The Department of Treasury of the State of New Jersey and Its Division of Investment (“Lead Plaintiff”), by and through its undersigned counsel, hereby moves unopposed for an Order granting Lead Plaintiff leave to file a twenty-five (25) page Memorandum of Law in Support of its Motion for Preliminary Approval of Class Action Settlement. Lead Plaintiff’s request seeks ten pages in excess of the 15-page limit set forth in Local Civil Rule 7.1(f) for memoranda relating to non-dispositive motions. Defendants Cliffs Natural Resources, Inc., Joseph Carrabba, Laurie Brlas, Terrance Paradie, and David B. Blake (collectively, “Defendants”) have informed Lead Plaintiff that they consent to this request for ten additional pages in its brief to be filed in support of the motion for preliminary approval of class action settlement.

Lead Plaintiff requires these ten additional pages to address effectively and thoroughly the factual and legal points in support of Lead Plaintiff’s Motion for Preliminary Approval of

Class Action Settlement including, *inter alia*, the facts and circumstances leading to the proposed class action settlement, the terms of the proposed settlement, the form and contents of the proposed notice to the class, and a demonstration of why class certification for settlement purposes is appropriate including a review of each of the Fed. R. Civ. P. 23 factors for consideration.

Accordingly, Lead Plaintiff respectfully submits that good cause exists for granting Lead Plaintiff the requested ten-page enlargement.

WHEREFORE, Lead Plaintiff respectfully requests that the Court grant Lead Plaintiff a ten-page extension of the page limitation for its Memorandum of Law in Support of its Motion for Preliminary Approval of Class Action Settlement, such that said memorandum may be up to 25 pages in length.

Respectfully submitted,

DATED: March 3, 2016

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CERTIFICATE OF SERVICE

A copy of the foregoing was filed electronically this 3rd day of March 2016. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Dated: March 3, 2016

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